

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 4**

IN THE MATTER OF:	)	
	)	
Seal Shield, LLC	)	<b>STOP SALE, USE, OR</b>
	)	<b>REMOVAL ORDER</b>
	)	FIFRA-04-2020-0703
	)	
Respondent.	)	
_____	)	

**I. AUTHORITY**

1. This Stop Sale, Use, or Removal Order (“Order”) is issued to Seal Shield, LLC pursuant to the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by Section 13(a) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA), 7 U.S.C. § 136k(a), which authorizes the Administrator of the EPA to issue an order prohibiting the sale, use, or removal of any pesticide or device by any person who owns, controls or has custody of such pesticide or device whenever there is reason to believe that such pesticide or device is in violation of any provision of FIFRA, or the pesticide or device has been or is intended to be distributed or sold in violation of any provision of FIFRA.
2. The Administrator of the EPA delegated this authority under FIFRA to the Regional Administrators by the EPA Delegation 5-12. The authority to issue Stop Sale, Use, or Removal Orders (SSUROs) has been redelegated to the Director of the EPA Region 4 Enforcement and Compliance Assurance Division.
3. Section 3 of FIFRA, 7 U.S.C. § 136a, states that no person in any State may distribute or sell to any person any pesticide that is not registered under FIFRA.

4. Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), provides that it is unlawful for any person in any State to distribute or sell to any person any pesticide that is not registered under Section 3.
5. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a “person” as “any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.”
6. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines a “pest” as “any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under [Section 25(c)(1)].”
7. Section 2(u) of FIFRA, 7 U.S.C. § 136(u), defines a “pesticide” in part, as “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.”
8. Section 2(mm) of FIFRA, 7 U.S.C. § 136(mm), defines an “antimicrobial pesticide” as “a pesticide that is intended to disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms; or protect inanimate objects, industrial processes or systems, surfaces, water, or other chemical substances from contamination, fouling, or deterioration caused by bacteria, viruses, fungi, protozoa, algae, or slime.”
9. Pursuant to 40 C.F.R. § 152.15 (Pesticide Products Required to be Registered), “a substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if (a) the person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) that the substance can or should be used as a pesticide; (b) the substance consists of or contains one or more active ingredients and has

no significant commercially valuable use as distributed or sold other than (1) use for pesticidal purpose (by itself or in combination with any other substance); (2) use for manufacture of a pesticide; or (c) the person who distributes or sells the substance has actual or constructive knowledge that the substance will be used, or is intended to be used, for a pesticidal purpose.”

10. 40 C.F.R. § 152.25 exempts certain “treated articles and substances” from regulations under FIFRA, if (1) the article or substance is treated with, or contains, a pesticide to protect the article or substance itself (for example, paint treated with a pesticide to protect the paint coating, or wood products treated to protect the wood against insect or fungus infestation), and (2) the pesticide is registered for such use.
11. On March 6, 2009, the EPA published the Pesticide Registration Notice 2000-1 (Notice to Manufacturers, Formulators, Producers and Registrants of Pesticide Products) (PRN 2000-1) to clarify and provide guidance on the scope of the “treated article exemption” and its applicability to antimicrobial pesticides. PRN 2000-1 makes it clear that the EPA does not intend this exemption to include articles or substances bearing implied or explicit public health claims against human pathogens.
12. The EPA’s PRN 2000-1 specifically states that the EPA considers an article or substance to make a public health claim if any of the following claims, among others, are made either explicitly or implicitly: 1) “[a] claim for the product as a sterilant, disinfectant, virucide or sanitizer, ... regardless of whether specific microorganisms are identified,” 2) “[a] claim of ‘antibacterial,’ ‘bactericidal,’ or ‘germicidal’ activity or references in any context to activity against germs or human pathogenic organisms implying public health related protection is made;” and 3) “[a]n unqualified claim of ‘antimicrobial activity.’”
13. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines “to distribute or sell” to include “to

distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, or release for shipment.”

14. 40 C.F.R. § 152.3 further defines “to distribute or sell” as “the acts of distributing, selling, offering for sale, holding for sale, shipping, holding for shipment, delivering for shipment or receiving and (having so received) delivering or offering to deliver, or releasing for shipment to any person in any state.”
15. Section 2(h) of FIFRA, 7 U.S.C. § 136(h) and 40 C.F.R. Subpart Z, define a “device” in part, as “any instrument or contrivance intended for trapping, destroying, repelling, or mitigating any pests or other form of plant or animal life.”
16. Pursuant to 40 C.F.R. § 152.500(b), a “pesticide device” is subject to the requirements set forth in FIFRA § 2(q)(1) and 40 C.F.R. Part 156 (Labeling Requirements for Pesticides and Devices).
17. Section 2(p) of FIFRA, 7 U.S.C. § 136(p), defines “label” as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers;” and defines “labeling” as “all labels and all other written, printed, or graphic matter – (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide or device ....”
18. Under Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), “a pesticide or pesticide device” is “misbranded” under several circumstances, including, but not limited to, when “its labeling bears any statement, design, or graphic representation relative thereto or its ingredients which is false or misleading in any particular,” or if “any word, statement, or other information required by or under the authority of [the Act] to appear on the label or labeling is not prominently placed thereon with such conspicuousness (as compared with other words, statements, designs, or graphic matter in the labeling) and in such terms as

to render it likely to be read and understood by the ordinary individual under customary conditions of purchase and use.”

19. Sections 12(a)(1)(E), 7 U.S.C. § 136j(a)(1)(E) and 12(a)(1)(F) of FIFRA, 7 U.S.C. § 136j(a)(1)(F), provide that it shall be unlawful for any person to distribute or sell to any person any pesticide which is adulterated or misbranded or any device which is misbranded.

## **II. BASIS FOR THE ORDER**

### **A. Sale and Distribution of Unregistered Pesticides in Violation of Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A)**

20. The Respondent in this matter is Seal Shield, LLC (hereinafter “Seal Shield” or “Respondent”), a limited liability company with its principle place of business located at 315 E. Robinson Street, Suite 500, Orlando, Florida 32801. Seal Shield is a “person” as defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s).
21. Seal Shield manufactures computer peripheral equipment and accessories and other equipment including, but not limited to, medical keyboards, medical scroll wheel mouse and mouse pads, screen protectors, ear buds, TV remotes, and the ElectroClave UV Disinfection/Device Manager (collectively, “Seal Shield Products”).
22. Upon information and belief, during the manufacturing process of the Seal Shield Products, the EPA-registered pesticide Ionpure IPL (EPA Reg. No. 73148-3), an antimicrobial preservative used to protect products from degradation, is mixed into the plastic materials and/or applied as a coating. The EPA accepted label for Ionpure IPL states that it is a “silver glass antimicrobial powder designed to be incorporated into various materials at various stages of their manufacturing process to preserve the integrity of the manufactured/treated materials ....”

23. Seal Shield primarily “sells and distributes” its products on its website, [www.sealshield.com](http://www.sealshield.com), and has marketed and continues to market its products with pesticide claims on its website as described below.
24. The EPA reviewed Seal Shield’s website at [www.sealshield.com](http://www.sealshield.com) as recently as March 18, 2020, and on other numerous occasions during the time that the EPA has attempted to bring Seal Shield into compliance as summarized below in paragraph 43. The EPA found that Seal Shield’s website has continuously included pesticide claims, and Seal Shield continues through the date of the issuance of this SSURO, to make pesticide claims including, but not limited to, a statement in the company’s logo prominently posted on its website:



and the following pesticide claims (including explicit, implicit and unqualified public health claims) for the identified products:

**Medical Computer Scroll Mice: (Specific list of products identified in Paragraph 46)**

- *“Seal Shield™ medical mice can help prevent cross-contamination in the OR. An antimicrobial is impregnated in the product, providing protection against viruses, fungi, mold, mildew, and odor-causing bacteria between cleaning times;”*
- *“Seal Shield antimicrobial technology provides a level of protection of the product between cleaning procedures;”* (located in an article titled *“Five High-Touch Surfaces Heavily Contaminated in the OR”* on the “Infection Control Corner” blog on the website); and
- *“I love that it is safe to touch because of its antimicrobial properties.”* (A purported customer review posted on Seal Shield’s website.

**Medical Screen Protectors (also known as Seal Screen Protectors)** for patient monitors for vital sign and anesthesia, and display monitors for computers, tablets and mobile devices: **(Specific list of products identified in Paragraph 46)**

- *“Contains antimicrobial product protection to help reduce microbial growth that can lead to hospital acquired infections;”*

- *“They feature antimicrobial product protection which helps reduce microbial growth on the screen surface;”*
- *“Seal Shield’s screen protector with Antimicrobial Product Protection was developed with healthcare in mind for Surgical Monitors, Touch Screens, Computers and Tablets.”*
- *“This product contains an antimicrobial additive built into the plastic, which protects the product and keeps it cleaner, greener and fresher by prohibiting the growth of mold, mildew, fungi and odor causing bacteria;”*
- *“Antimicrobial Product Protection for in-between cleanings;” and*
- *“Each screen protector contains an antimicrobial, fungistatic agent which protects the product and keeps it cleaner, greener and fresher by inhibiting the growth of microbial bacteria, mold, mildew and fungi on the product’s surface.”*

**Medical Grade Keyboards: (Specific list of products identified in Paragraph 46)**

- *“How are Keyboards tested for microbial resistance – All tests are done in an independent lab-Bacteria used for testing: Escheria coli and staphylococcus” (found under the FAQs);*
- *“Reduce the risk of cross contamination and hospital acquired infections;”*
- *“Seal Shield antimicrobial product protection technology provides a level of protection of the product between cleaning procedures;”*
- *“Waterproof construction and antimicrobial product surface protection are the most important infection control features of a medical keyboard;”*
- *“Silver Seal Protection. This product is Silver Seal <sup>TM</sup> protected. It contains an antimicrobial, fungistatic agent which protects the product and keeps it cleaner, greener and fresher by inhibiting the growth of micro-bial bacteria, mold, mildew and fungi on the products surface.”*
- *“Medical keyboards have recently become recognized as an important and cost-effective tool for infection prevention;” and*
- *“Products with antimicrobial protection,” and “infection control and prevention.”*

**TV Remotes (Universal Remotes and Universal TV Remotes) (Specific list of products identified in Paragraph 46)**

- *“Seal Shield TV Remotes have an antimicrobial additive built into the plastic, which protects the product and keeps it cleaner, greener and fresher by prohibiting the growth of mold, mildew, fungi and odor causing bacteria.”*

**Clean Sleeve for the Microsoft Surface Pro Fitted Keyboard Cover (Specific list of products identified in Paragraph 46)**

- *“This product contains an antimicrobial fungistatic agent which protects the product and keeps it cleaner, greener and fresher by inhibiting the growth of micro-bial bacteria, mold, mildew and fungi on the products surface;” and*
- *“Antimicrobial Product Protection.”*

**Seal Buds Ear Buds and Seal Pen (Specific list of products identified in Paragraph 46)**

- *“Antimicrobial Product Protection.”*

25. During the recent review of Seal Shield’s website on March 18, 2020, the EPA also determined that Seal Shield updated its website to include a blog - “Infection Control Corner” which has several articles posted about the coronavirus, including one titled *“Seal Shield Hopes to Reduce Cross-Contamination Points that Help Spread the Coronavirus”* dated February 14, 2020, among others, that directly reference the pages (via hyperlink), to the products’ data sheets containing some of the above-referenced pesticide claims (public health claims). Some of the articles also contain unqualified public health claims such as *“[A]dditionally, Seal Screen also comes with anti-microbial product protection, making this the best solution for preventing your phone from becoming the premier hangout spot for all the bacteria in your life.”*
26. On March 27, 2020, the EPA also conducted an internet search and found that Seal Shield was advertising its silver storm keyboards, scroll mice and TV remotes in several YouTube videos, using pesticide claims (public health claims) including, but not limited to, statements that the aforementioned Seal Shield products *“have antimicrobial technology that ... protects against mold, mildew, fungi and odor causing microbial bacteria growth “* and *“features antimicrobial product protection for hygienic surfaces every time.”*
27. Seal Shield has asserted that because its products are treated with the EPA-registered pesticide Ionpure IPL, the products meet the “treated article exemption” requirements under 40 C.F.R. § 152.25(a) and are therefore exempt from the FIFRA registration requirements. Seal Shield’s claims referenced in paragraphs 24, 25 and 26, go beyond

promoting products that are treated with the Ionpure pesticide to protect the products themselves, to making explicit, implicit or unqualified health/hygiene-associated claims that the use of its products will protect human health by preventing the transmission of infections and viruses.

28. Seal Shield's public health claims referenced above in paragraphs 24, 25 and 26, about its products are directly contrary to the stated intended purpose of the Ionpure IPL pesticide incorporated into the products. Seal Shield's claims about its products are also inconsistent with the EPA's interpretation of the "treated article exemption" set forth in PRN 2000-1. Therefore, Seal Shield products do not qualify for the "treated article exemption" under 40 C.F.R. § 152.25 and are subject to FIFRA registration requirements.
29. Seal Shield makes pesticide claims about its products identified in Section IV of this SSURO, as described above in paragraphs 24, 25 and 26. Therefore, the products meet the definition of a "pesticide" pursuant to Section 2(u) of FIFRA, 7 U.S.C. § 136(u), in that, as marketed, Seal Shield products are "intended for preventing, destroying, repelling, or mitigating any pest."
30. On March 27, 2020, the EPA conducted a search on the Product Pesticide Label System (PPLS) database for the Seal Shield products identified in Section IV of this SSURO and confirmed that Seal Shield products are not registered as pesticides, in accordance with Section 3 of FIFRA, 7 U.S.C. § 136a.
31. Following multiple attempts by the EPA summarized below in paragraph 43 to work with Seal Shield to revise the marketing/advertising material and website for its products to remove all pesticide claims (public health claims), the EPA issued Seal Shield a "Notice of Continuing Violation" letter on September 24, 2019, that again informed Seal Shield that it was continuing to violate FIFRA. The letter requested that within ten days of the

date of receipt of the letter Seal Shield submit in writing the steps it had taken to correct the violations; and notified Seal Shield that if it failed to correct the alleged FIFRA violations, the EPA would consider all of its enforcement options including, but not limited to, issuing a SSURO. Seal Shield did not provide a written response with any of the information requested by the EPA.

32. On December 10 and 13, 2019, the EPA conducted inspections at an office of one of Seal Shield's distributors, Tech Data Corporation, located at 16202 Bay Vista Drive, Clearwater, Florida 33760, and its distribution center located at 3055 Shawnee Industrial Way, Suwanee, Georgia 30024 ("the inspections"). The EPA also attempted to conduct an inspection at Seal Shield's office in Orlando, Florida, but was unable to do so because Seal Shield's representatives were not present at the time.
33. During the inspections, the EPA inspector collected documentary evidence including sales invoices dated December 17, 2018 through July 1, 2019; marketing material for the Medical Screen Protectors, Silver Shield Medical Grade Keyboards, Silver Storm Waterproof Scroll Wheel Mouse, and the ElectroClave UV Disinfection/Device Manager; and a copy of the instruction manual for all the products. The collected marketing material and instruction manual reference Seal Shield's website, [www.sealshield.com](http://www.sealshield.com).
34. The EPA's review of Seal Shield's website and the sales invoices dated December 17, 2018 through July 1, 2019, collected during the inspections, confirm that Seal Shield offers for sale, sells and distributes pesticides, as defined by Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg) and 40 C.F.R. § 152.3.
35. Seal Shield's "sale and distribution" of unregistered pesticides are unlawful acts in violation of Section 3 of FIFRA, 7 U.S.C. § 136a, and 12(a)(1)(A) of FIFRA, 7 U.S.C.

§ 136j(a)(1)(A).

**B. Sale and Distribution of Misbranded Pesticide Device in Violation of Section 12(a)(1)(F) of FIFRA, 7 U.S.C. § 136j(a)(1)(F)**

36. Seal Shield sells the ElectroClave UV Disinfection/Device Manager equipment that is used to disinfect mobile devices including mobile phones and tablets. The ElectroClave UV Disinfection/Device Manager is marketed by Seal Shield as an “instrument that is intended for repelling and mitigating any pests” and is therefore a pesticide “device” as defined by Section 2(h) of FIFRA, 7 U.S.C. § 136(h) and 40 C.F.R. Subpart Z, and is subject to the requirements in FIFRA § 2(q)(1) and 40 C.F.R. § 152.500(b) (Requirements for Devices) and 40 C.F.R. Part 156 (Labeling Requirements for Pesticides and Devices).
37. On multiple occasions summarized below in paragraph 43, the EPA informed Seal Shield that the EPA had reviewed its website and found that it was offering for “sale and distribution” the ElectroClave UV Disinfection/Device Manager, with claims stating that the device “*reduces most major pathogens including methicillin resistant staphylococcus aureus (MRSA), vancomycin-resistant enterococcus (VRE), multidrug resistant (MDR)-gram negative, norovirus and clostridium difficile (C. diff) spores by up to 99.9 percent.*” The EPA informed Seal Shield that the[se] efficacy claims being made about the device were considered false or misleading as the [efficacy] study submitted to the EPA by Seal Shield on October 7, 2019, did not support the claims.
38. Subsequent to the EPA’s notifications that the device was considered misbranded, Seal Shield has continued to “sell and distribute” the Electroclave UV Disinfection/Device Manager, using unsubstantiated false or misleading efficacy claims including, but not limited to, claims the EPA identified on the website on or about March 18, 2020, stating

that “*ElectroClave’s patented disinfection technology achieves a 99.99% pathogen kill on all sides of the device (360° disinfection).*”

39. On March 27, 2020, the EPA again reviewed Seal Shield’s website and determined that Seal Shield had updated its website to include a blog - “Infection Control Corner” which posted an article dated March 19, 2020, titled “*Can the Electroclave Help with COVID-19? It can help with a Lot Worse,*” with the sub-heading “*The ElectroClave Can Help Ease Your Worries about Coronavirus.*” The article goes on to state that the device “*is currently being used for disinfection in the labs that research the most horrible agents on the planet – even more horrible than the coronavirus...*” The article directly references (via hyperlink), the device’s data sheet on the website which contains the false or misleading efficacy claims that are referenced above in paragraphs 37, 38 and in this paragraph.
40. On March 27, 2020, the EPA conducted another general internet search and identified a post on Twitter.com dated September 24, 2019, made by Vince Schreiber, Seal Shield’s Chief Financial Officer, stating “*Shipping #electroclave to our newest partners @SkytronLLC #uvcdisinfection #infection prevention@Sealshield.com,*” along with a picture of the ElectroClave UV Disinfection/Device Manager packaged in a large container with Seal Shield’s website address prominently printed on it. The ElectroClave UV Disinfection /Device Manager container references the website; therefore, the website is considered “labeling” under Section 2(p) of FIFRA, 7 U.S.C. § 136(p), 40 C.F.R. § 152.500(b) and 40 C.F.R. Part 156.
41. The website contains efficacy claims detailed above in paragraphs 37, 38 and 39, which are false or misleading based on the EPA’s review of Seal Shield’s submitted study referenced above in paragraph 37. The pesticide device is therefore misbranded under

Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A).

42. Seal Shield's sale and distribution of the Electroclave UV Disinfection/Device Manager, a "misbranded" pesticide device, is a violation of Section 12(a)(1)(F) of FIFRA, 7 U.S.C. § 136j(a)(1)(F).

### **III. SUMMARY OF EPA'S COMPLIANCE ASSISTANCE EFFORTS**

43. The EPA has made multiple attempts to bring Seal Shield into compliance with FIFRA, as referenced above in paragraphs 31 and 37, including, but not limited to, the following occasions when the EPA tried to work with Seal Shield to remove the pesticide claims and the unsubstantiated efficacy claims to correct violations of Sections 12(a)(1)(A) (Sale and Distribution of Unregistered Pesticides) and 12(a)(1)(F) of FIFRA (Sale and Distribution of a Misbranded Pesticide Device):

- On December 8, 2017, the EPA held a Show Cause meeting with Seal Shield to discuss the alleged FIFRA violations. The EPA provided Seal Shield an opportunity to present facts, information and evidence as to why EPA should not take an enforcement action in response to the alleged violations of FIFRA.
- In a letter dated January 18, 2018, the EPA provided Seal Shield with additional information about the "pesticide claims" being made for its products.
- On January 25, 2018, at Seal Shield's request, the EPA held a follow-up meeting to further identify the "pesticide claims" and to provide compliance assistance. The EPA also requested that Seal Shield submit stud(ies) for the ElectroClave UV Disinfection/Device Manager.
- In a letter dated April 19, 2018, the EPA outlined and identified all the compliance measures that Seal Shield would have to take to correct the FIFRA violations.
- In an email to the EPA dated June 4, 2018, Seal Shield responded to the EPA's compliance measures letter identifying the steps it had taken, including revising its website and sending written notification to distributors and retailers to inform them that the Seal Shield products should not be marketed using pesticide claims (public health claims) in violation of FIFRA.
- In a letter dated July 10, 2018, the EPA informed Seal Shield that the compliance measures, including removing "pesticide claims" from its website, were incomplete and inadequate to address the continuing noncompliance with FIFRA.
- On September 19, 2018, the EPA and Seal Shield held a conference call to discuss the additional revisions that Seal Shield purportedly made to its website to remove remaining "pesticide claims." The EPA again requested that Seal Shield submit all the efficacy stud(ies) for the ElectroClave UV Disinfection/Device Manager

for review and Seal Shield indicated that they would do so.

- In an email dated October 11, 2018, the EPA informed Seal Shield that after reviewing its website, and Amazon, Walmart and Staples websites, the EPA identified numerous remaining “pesticide claims.”
- In an email dated October 24, 2018, the EPA again requested that Seal Shield submit all the efficacy stud(ies) for the ElectroClave UV Disinfection/Device Manager and indicated that the stud(ies) should be sent by November 7, 2018. Seal Shield sent one study to the EPA for review on November 9, 2018, which the EPA determined did not support the device’s efficacy claims.

#### **IV. SUMMARY OF BASIS FOR THE ORDER**

44. In light of the findings set forth above in paragraphs 20 to 35, the EPA has reason to believe that the Seal Shield products identified in paragraph 46 below are unregistered pesticides that are being distributed and/or sold in violation of 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A).
45. In light of the findings set forth above in paragraphs 36 to 42, the EPA has reason to believe that Seal Shield is selling and/or distributing the ElectroClave UV Disinfection/Device Manager, a “misbranded” pesticide device, in violation of 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

#### **V. ORDER**

46. Pursuant to Section 13(a) of FIFRA, Seal Shield is hereby ordered to STOP any further distribution, sale, use, or removal of the following products in its custody or control except in compliance with FIFRA:

##### **A. Unregistered Pesticides:**

##### **Medical Grade Keyboards**

- Silver Seal Glow Standard Style Keyboard 207G Series
- Silver Seal Standard Style Keyboard 207 Series
- Silver Storm Standard Style Keyboard 503 Red Series
- Silver Storm Standard Style Keyboard 503 Series
- Seal Shield Seal Touch Glow Silicone All-in-One Keyboard S90 Series
- Seal Shield Cleanwipe Small Form Keyboard 99 Series
- Seal Glow Silicone Keyboard S106 Series
- Seal Touch Silicone All-in-One Keyboard S87 Series

**Medical Screen Protectors (also known as Seal Screen Protectors)**

- Seal Screen Protector for CARESCAPE B450 Patient Monitor
- Seal Screen Protector for CARESCAPE B650 Patient Monitor
- Seal Screen Protector for CARESCAPE B850 Patient Monitor
- Seal Screen Protector for the iPad Pro 9.7
- Seal Screen Protector for the iPad Pro 2/3/4/-SSIP

**TV Remotes (Universal Remotes and Universal TV Remotes)**

- Seal Shield Wireless Mouse SM3W Series
- Seal Shield Silver Seal Universal TV Remote

**Medical Computer Scroll Mice:**

- Silver Storm Scroll Wheel Mouse 042 Red Series
- Silver Storm Wireless Scroll Wheel Mouse 042W & 042BT Series
- Silver Surf Mouse SM7 Series
- Silicone Scroll Mouse SM3 Series
- Slim Seal 5-in-1 Universal Remote Control

**Clean Sleeve for the Microsoft Surface Pro Fitted Keyboard Cover**

- Clean Sleeve for the Microsoft Surface Pro Fitted Keyboard Cover

**Seal Buds Ear Buds and Seal Pen**

- Seal Pen
- Seal Buds Ear Buds

**B. Misbranded Pesticide Device:**

- ElectroClave UV Disinfection/Device Manager

47. The unregistered pesticide products and the misbranded pesticide device identified above, in paragraph 46, shall not be sold; offered for sale; held for sale; shipped; delivered for shipment; received; or having been so received; delivered; offered for delivery; moved or removed from wherever the products are located, without prior written approval from the EPA. Seal Shield shall send all written request(s) for approval to:

Marlene Tucker  
U.S. EPA Region 4  
Office of Regional Counsel  
61 Forsyth Street, SW

Atlanta, Georgia 30303  
[tucker.marlene@epa.gov](mailto:tucker.marlene@epa.gov)

48. This SSURO applies to all quantities of the unregistered pesticide products identified above and the misbranded pesticide device identified above, within the ownership, control, or custody of Seal Shield, wherever located in the United States, or that may come into the possession of Seal Shield, so long as the products are not registered with the EPA.
49. Violation of the terms or provisions of this SSURO may subject Seal Shield to civil penalties as prescribed in Section 14 of FIFRA, 7 U.S.C. §136l.
50. The issuance of this SSURO shall not act as a waiver by the EPA of any enforcement or other authority available to the EPA under FIFRA.
51. This Order shall be EFFECTIVE IMMEDIATELY upon receipt by Seal Shield.
52. This SSURO shall remain in effect unless and until revoked, terminated, suspended, or modified in writing by the EPA.
53. If any provision or provisions of this Order is/are subsequently held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not be affected or impaired thereby and they shall remain in full effect.
54. Seal Shield may seek federal judicial review of the SSURO pursuant to Section 16 of FIFRA, 7 U.S.C. §136n.

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Date

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Carol L. Kemker  
Director  
Enforcement and Compliance Assurance Division

## CERTIFICATE OF SERVICE

I hereby certify that this Stop Sale, Use, and Removal Order, Docket Number: FIFRA-04-2020-0703 was sent via certified mail/return receipt requested and an electronic copy was sent to:

Mr. Andrew McCarthy  
Vice-President of Intellectual Property  
315 E. Robinson Street,  
Suite 500  
Orlando, Florida 32801  
[andrew@sealshield.com](mailto:andrew@sealshield.com)

(via Certified mail and Electronic Mail)

Mr. Ed Schwartz  
Attorney at Law  
Sweetnam & Schwartz, LLC  
1200 Ashwood Parkway, Suite 190  
Atlanta, Georgia 30338  
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Ms. Marlene Tucker  
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U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
[tucker.marlene@epa.gov](mailto:tucker.marlene@epa.gov)

(via Electronic Mail)

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DATE

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